

Exhibit 3

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Case Type: CIVIL OTHER

Lindell Management LLC,

Petitioner,

vs.

Robert Zeidman,

Respondent.

**NOTICE OF MOTION AND
MOTION TO VACATE
ARBITRATION AWARD**

TO: RESPONDENT ABOVE-NAMED AND THEIR ATTORNEYS BRIAN A. GLASSER & CARY JOSHI, BAILEY & GLASSER LLP, 1055 THOMAS JEFFERSON ST., SUITE 540, WASHINGTON D.C. 20007.

NOTICE OF MOTION

PLEASE TAKE NOTICE that the undersigned will move to vacate the Reasoned Decision and Final Arbitration Award (the “Award”) dated April 19, 2023. A hearing date for this motion will be set upon judicial assignment.

MOTION

Petitioner moves this Court under 9 U.S.C. § 10(a)(4) and Minn. Stat. § 572B.23(a)(4) for an order vacating the Award. This motion is based upon all of the files, records, and proceedings herein, including a memorandum of law and declaration and the arguments of counsel.

Respectfully Submitted,

Dated: May 18, 2023

PARKER DANIELS KIBORT LLC

By: /s/Alec J. Beck
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Alec J. Beck (#201133)
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Attorneys for Petitioner

Acknowledgment

The undersigned hereby acknowledges that, pursuant to Minn. Stat. § 549.211, Subd. 2, costs, disbursements, and reasonable attorney and witness fees may be awarded to the opposing party or parties in this litigation if the Court should find the undersigned acted in bad faith, asserted a claim or defense that is frivolous and that is costly to the other party, asserted an unfounded position solely to delay the ordinary course of the proceedings or to harass, or committed a fraud upon the Court.

/s/Alec J. Beck